

1 The Honorable Ricardo S. Martinez
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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10 WASHINGTON STATE ASSOCIATION OF
11 HEAD START AND EARLY CHILDHOOD
ASSISTANCE AND EDUCATION
12 PROGRAM; ILLINOIS HEAD START
ASSOCIATION; PENNSYLVANIA HEAD
START ASSOCIATION; WISCONSIN HEAD
START ASSOCIATION; FAMILY
13 FORWARD OREGON; and PARENT
VOICES OAKLAND,
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Plaintiffs,

15 v.
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17 ROBERT F. KENNEDY, JR., in his official
18 capacity as Secretary of Health and Human
Services; U.S. DEPARTMENT OF HEALTH
19 AND HUMAN SERVICES; ANDREW
GRADISON, in his official capacity as Acting
20 Assistant Secretary of the Administration for
Children and Families; ADMINISTRATION
FOR CHILDREN AND FAMILIES; OFFICE
21 OF HEAD START; and TALA HOOBAN, in
her official capacity as Acting Director of the
Office of Head Start,
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Defendants.
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Case No. 2:25-cv-00781-RSM
DEFENDANTS' NOTICE OF
SUPPLEMENTAL AUTHORITY

1 Pursuant to Local Civil Rule 7(n), Defendants hereby bring to the Court's attention relevant
 2 supplemental authority which was issued after the briefing was complete on Plaintiffs' Motion for
 3 a Preliminary Injunction and Plaintiffs' Motion for a Temporary Restraining Order.

4 First, the United States Supreme Court entered a stay pending appeal in *McMahon v. New*
 5 *York*, 606 U.S. __, 2025 WL 1922626 (July 14, 2025) (Mem.), which reflects the Court's
 6 determination that the Government is likely to prevail against a challenge to a reduction-in-force
 7 (RIF) at the Department of Education. *See* Exhibit A.

8 Second, the Supreme Court entered a stay pending appeal in *Trump v. Am. Fed'n of Gov't*
 9 *Emps.*, 606 U.S. __, 2025 WL 1873449 (July 8, 2025) (Mem.), which covered the same RIFs and
 10 restructuring at issue in this case. *See* Exhibit B.

11 Third, the U.S. Department of Health and Human Services (HHS) has agreed to stay
 12 enforcement of the Notice of the reinterpretation of the Personal Responsibility and Work
 13 Opportunity Reconciliation Act of 1996 (PRWORA), in *State of New York v. U.S. Dep't of Justice*,
 14 1:25-cv-00345-MSM-PAS (D.R.I.), while that court adjudicates a pending Motion for a
 15 Preliminary Injunction, which encompasses the same issues in Plaintiffs' Motion for a Temporary
 16 Restraining Order. *See* Exhibit C.

17 DATED this 29th day of July, 2025.

18 Respectfully submitted,

19 TEAL LUTHY MILLER
 20 Acting United States Attorney

21 s/ Kristin B. Johnson
 22 KRISTIN B. JOHNSON, WSBA #28189
 23 Assistant United States Attorney
 24 United States Attorney's Office
 700 Stewart St., Ste. 5220, Seattle, Wash. 98101
 Telephone No. (206) 553-7970 / Fax No. (206) 553-4073
 Email: kristin.b.johnson@usdoj.gov

25 Attorneys for Defendants